

November 8, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Via ECFS

Re: Ex Parte Communication, *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

The 37 undersigned Iowa rural telecommunications companies¹ (“Iowa A-CAM Companies”) representing 45 study areas respectfully request the Federal Communications Commission (“Commission”) to allocate additional funding up to \$200/month per eligible customer location for all companies nationwide that voluntarily elected universal service funding under the Alternative Connect America Fund (“A-CAM”) model. In fact, Iowa is the state with the largest number of A-CAM-electing companies in the country, and the Iowa A-CAM Companies are already well under way with their deployment plans to meet the obligations laid out by the Commission.

Allocation of funding up to \$200/month per eligible location will reduce the locations designated “reasonable request” by 3,578 locations to only 2,632 locations. Furthermore, because of this funding, 2,615 additional locations in the state will receive service at 25/3 Mbps, while 2,453 additional locations will have increased service of at least 10/1 Mbps.

The Iowa A-CAM Companies point out that the Commission has already supported as Commission public policy A-CAM funding at \$200/month per location in the original rate-of-return carriers’ reform order.² Such an increase in funding will require no additional policy determinations by the Commission. Moreover, A-CAM Companies will be required to accept the additional buildout obligations under the conditions of the Order and Further Rulemaking issued in December 2016 should the Commission act by the end of 2017.³

¹ The Iowa A-CAM Companies are listed in Attachment A.

² *Connect America Fund; ETC Annual Reports and Certifications; Developing a Unified Inter-carrier Compensation Regime*, WC Docket Nos. 10-90 *et. Al.*, Report and order and Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-33 (rel. March 30, 2016).

³ *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-178 (rel. Dec. 20, 2016).

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Granting of A-CAM funding at \$200/month per location will also result in a prudent use of the Commission's budget by enabling companies to design their networks in a more efficient manner at the outset without costly redesign. In addition, the costs of deploying broadband technology initially are less than the costs of installing interim solutions that will need to be replaced later.

On behalf of the thousands of customers they serve, the Iowa A-CAM Companies urge the Commission to act expeditiously and fund the A-CAM model at \$200/month per eligible location by December 31, 2017.

Sincerely,

The Iowa A-CAM Companies

Cc: Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Jessica Rosenworcel
Commissioner Brendan Carr

Attachment A

Attachment A
Iowa A-CAM Companies

Barnes City Cooperative Telephone Company
Breda Telephone Corp.
Butler-Bremer Mutual Telephone Company
Coon Creek Telephone Company
Center Junction Telephone Company, Inc.
Coon Valley Cooperative Telephone Association, Inc.
Cooperative Telephone Company
Casey Mutual Telephone Company
Danville Mutual Telephone Company
East Buchanan Telephone Cooperative
Farmers Telephone Company-Essex
Farmers Mutual Cooperative Telephone Company-Harlan
Farmers Mutual Telephone Company-Jessup
Jefferson Telephone Company
La Motte Telephone Company
Lone Rock Cooperative Telephone Company
Mechanicsville Telephone Company
Modern Cooperative Telephone Company
Martelle Cooperative Telephone Association
Massena Telephone Company
Mutual Telephone Company of Morning Sun
Northwest Telephone Cooperative
Northeast Iowa Telephone Company
North English Cooperative Telephone Company
New Ulm Telecom, Inc.
Olin Telephone Company, Inc.
Onslow Cooperative Telephone Association
Rockwell Cooperative Telephone Association
Sac County Mutual Telephone Company
Schaller Telephone Company
Superior Telephone Cooperative
Templeton Telephone Company
Terril Telephone Cooperative
Titonka Telephone Company
Van Buren Telephone Co., Inc.
Western Iowa Telephone Association
Wyoming Mutual Telephone Company